

UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Sarah Washco : Chapter 13

Debtor : Bky No. 19-17850-AMC

Motion for Post-Confirmation Plan Modification

1. On July 8, 2020 confirmed the debtor's original plan.
 2. The plan was modified by this court on 12/17/20 extending it to 84 months.
 3. The plan was again modified on April 6, 2022 due to a family emergency.
 4. Since that time, and due to inflationary pressures and new required expenses, the debtor is unable to maintain her current level of payment without defaulting.
 5. The debtor has filed Amended Schedules I and J with the court illustrating her predicament on November 11, 2022. Those amended schedules are incorporated herein by reference.
 6. The debtor has filed, on the same day, a proposed modified plan with this court, document #95.
 7. The debtor's budget shows that she will be able to complete the new modified plan with the salary of her husband.
 8. A copy of the proposed modified plan is attached hereto as Exhibit "A".
- WHEREFORE, the debtors request the court to approve the plan modification attached.

s/Lawrence S. Rubin, Esquire

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